December 13, 2023

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

CLERK, U.S	S. DISTRICT COURT	
WESTERN	DISTRICT OF TEXAS	
By:	MR	
<u>-</u>	Deputy Clerk	

UNITED STATES OF AMERICA	
Plaintiff	Case No: SA:23-CR-00636
v	JKP(3)
BRADLEE TAYLOR GRINDE (3)	
Defendant	

## GOVERNMENT'S MOTION FOR DETENTION HEARING, FOR DETENTION, AND FOR CONTINUANCE

### TO THE UNITED STATES MAGISTRATE JUDGE:

The Government, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and pursuant to 18 U.S.C. § 3141, et. seq, moves for pretrial detention of Defendant; for a detention hearing regarding the above-named Defendant; and for a continuance of said hearing. In support of these motions, the Government shows as follows:

#### I. MOTION FOR DETENTION HEARING

The Government requests that a hearing be set regarding detention pursuant to 18 U.S.C. § 3142(f), as this matter involves one of more of the following: an offense with a maximum sentence of life imprisonment or death Xa qualifying controlled substance offense with a maximum sentence of 10 years or more  $\times$ a felony offense that involves the possession or use of a firearm (including but not limited to felon in possession of a firearm), destructive device, or any other dangerous weapon a felony offense that is a crime of violence as defined under 18 U.S.C. § 3156(a)(4) to include a felony offense under 18 U.S.C. chapter 77, 109a, 110 or 117

	a felony offense that involves a minor victim					
	an offense that involves failure to register as a sex offender under 18 U.S.C. § 2250					
$\boxtimes$	a serious risk that the Defendant will flee					
$\boxtimes$	a serious risk that the Defendant will obstruct or attempt to obstruct justice					
II.	MOTION FOR DETENTION					
	Grounds for detention. The Government further requests that Defendant be detained					
pendii	ng trial in this case pursuant to 18 U.S.C. §§ 3141(a) and 3142(e), because no condition or					
combi	ination of conditions will reasonably assure:					
$\boxtimes$	Defendant's appearance as required					
$\boxtimes$	the safety of any other person or the community					
III.	MOTION FOR CONTINUANCE					
	Three-day continuance. Pursuant to 18 U.S.C. § 3142(f), the Government moves for a					
three-	day continuance of the detention hearing in the matter.					
IV.	NOTICE OF REBUTTABLE PRESUMPTION IN FAVOR OF DETENTION					
	Presumption of detention. In addition, the Government gives notice that 18 U.S.C. §					
3142(	e)(3) establishes a rebuttable presumption that no condition or combination of conditions					
will re	easonably assure the appearance of the person as required and the safety of the community,					
becaus	se there is probable cause to believe that Defendant committed:					
$\boxtimes$	a qualifying controlled substance offense with a maximum sentence of 10 years or more					
$\boxtimes$	an offense under 18 U.S.C. § 924(c)					
	an offense under 18 U.S.C. chapter 77 for which a maximum term of imprisonment of 20 years or more is prescribed					
	a qualifying offense involving a minor victim					

# V. NOTICE OF APPLICABILITY OF TEMPORARY DETENTION OF UP TO 10 DAYS

	Temporary detention. The Government gives no	tice, pursuant to 18 U.S.C. § 3142(d), that					
Defend	endant is subject to temporary detention of up to to	en days, as Defendant may flee or pose a					
danger	ger to any other person or the community, and Defe	ndant was:					
	at the time the offense was committed, on release pending trial for a felony offense						
	at the time the offense was committed, on release pending imposition or execution of sentence, appeal of sentence or conviction, or completion of sentence for an offense						
	at the time the offense was committed, on probation or parole for an offense						
	and is not, a United States citizen or not admitted lawfully for permanent residence						
	Respectful	ly submitted,					
	JAIME ES United Sta	PARZA tes Attorney					
	Assistant U 601 NW L San Anton Phone: (21	C. BROWN United States Attorney oop 410, Suite 600 io, Texas 78216-5512 0) 384-7441 anda.Brown@usdoj.gov					

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

UNI	TED	STA	TES OF AMI	ERICA							
Plain	tiff										
v											
BRA	DLE	EE TA	AYLOR GRI	NDE (3)							
Defe	ndant	t									
				<u>(</u>	<u>ORDE</u>	<u>R</u>					
	On	this c	late the Court	considered the	Gover	nment's Motio	n to De	tain Defer	ıdant	, and	the
Court	havii	ng rev	viewed said mo	otion finds that	it shou	ıld be GRANT	ED.				
	IT	IS H	IEREBY OR	<b>DERED</b> that	the Go	overnment's M	otion t	o Detain	Defe	endan	ıt is
GRA]	NTE	D.									
	IT	IS	FURTHER	ORDERED	that	Defendant's	bond	hearing	is	set	for
				_ at a.	.m. / p.	m.					
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